

FILED
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

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CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
08 MJ 1033

UNITED STATES OF AMERICA,
Plaintiff

vs.

Victor Hugo RENDON-Lara
Defendant.

Magistrate's Case Number:

BY: 

DEPUTY

COMPLAINT FOR VIOLATION OF:

Title 18, United States Code
Section(s) 545
Importing Merchandise Contrary to
Law (Felony):

The undersigned complainant being duly sworn states:

COUNT ONE

That on or about April 3, 2008, within the Southern District of California, defendant Victor Hugo RENDON-LARA did knowingly and intentionally import approximately 102.85 kilograms of Iodine, a schedule II controlled substance, into the United States from a place outside thereof; in violation of Title 18, United States Code, Section 545.

And the complainant states that this complaint is based on the attached statement of facts, incorporated herein by reference.


Angela M. Sanchez, Special Agent
U.S. Immigration & Customs Enforcement

Sworn to before me and subscribed in my presence this 4th day of April 2008.


UNITED STATES MAGISTRATE JUDGE

United States of America
vs.
Victor Hugo RENDON-Lara

{STATEMENT OF FACTS}

On April 3, 2008 at approximately 6:35 p.m., Victor Hugo RENDON-LARA (RENDON) applied for entry into the United States from Mexico at the San Ysidro of Entry (POE). RENDON was the driver and sole occupant of a green Chevrolet Suburban bearing California license plate number 5SYW324. United States Customs and Border Protection Officer (CBPO) Llanos was performing primary inspection duties at the San Ysidro POE on lane number eight when RENDON presented himself for entry into the United States. RENDON presented a U.S passport (#435127204) and a California commercial driver license (#C6468987). CBPO Llanos asked RENDON what he was bringing from Mexico. RENDON responded that he was bringing back cokes and chips. CBPO Llanos inspected the rear of the Suburban and encountered two large cylindrical carton containers without labels. CBPO Llanos asked RENDON what the items were. RENDON replied that it was grease to clean the semi trucks and that RENDON had purchased it in the U.S. CBPO Llanos reported that the containers were extremely heavy for the size of the containers. CBPO Llanos escorted RENDON to the secondary lot. While probing the containers, CBPO Llanos suspected the containers contained iodine. CBPO Llanos then escorted RENDON to the security office and the vehicle was turned over to the vehicle secondary lot for further processing.

CBPO Eckhout was assigned to conduct a full seven point inspection of the green Chevrolet Suburban bearing California license plate number 5SYW324 driven by RENDON. CBPO Eckhout was informed that RENDON had two large cylindrical carton containers without labels located in the rear of the suburban. While CBPO Eckhout was conducting his seven point inspection of the suburban he located two containers possibly containing hazardous material. VSE was contacted and Patriot Environmental Services responded. Patriot Environmental Services determined the hazardous material to be iodine. The two containers removed from the vehicle had a combined weight of approximately 102.85 kilograms.

At approximately 9:41 p.m. on April 3, 2008, Immigration and Customs Enforcement (ICE) Special Agent (S/A) Angela M. Sanchez advised RENDON of his Constitutional rights, as per Miranda, in the Spanish language. Post-Miranda, RENDON provided the following statements in summary:

RENDON denied knowledge that the containers he had in his possession contained iodine. RENDON stated he had purchased the containers of what he said was degreaser in Irwindale, California on April 3, 2008. RENDON stated he purchased both containers for a total of \$500.00 from two unknown males. RENDON said the two unknown males asked RENDON if RENDON wanted his truck cleaned. RENDON said the unknown males had approximately 3 to 4 more containers besides the ones he had purchased.

RENDON said that a liquid was pored into a small, empty water bottle, shaken and then poured on his semi truck leaving it clean. RENDON said that the unknown males told REDON that each container held about 35 pounds of degreaser and that with 5 pounds of degreaser he could clean about 5 semi trucks and charge \$50.00 to wash them.

RENDON also said that the unknown males told RENDON to wear gloves when washing the semi trucks with the degreaser because if it got on skin it would cause white blisters.

RENDON said that after he got off of work he dropped off his semi truck at a job location in Santa Fe Springs, CA and picked up his suburban. RENDON said that he placed the two containers into his suburban by himself and then gave his friend a ride to the airport in Tijuana, Mexico. As stated above RENDON said he moved the containers himself which he said weighed about 35 pounds (15.90 kgs) but the actually weight was approximately 112.2 pounds (51 kgs).

RENDON was arrested for violating Title 18, United States Code, Section 545 Importation merchandise contrary to law.